

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI**

In re Amanda Gayle Smith

Case No. 22-40882-DRD

Debtor.

Chapter 13

OBJECTION TO TRUSTEE'S MOTION TO DISMISS

Amanda Gayle Smith ("Debtor"), through her counsel, Michael J. Watton and the Watton Law Group ("Counsel"), hereby responds to the Chapter 13 Trustee's Motion to Dismiss.

Debtor became delinquent in plan payments due to unforeseen expenses.

Debtor will file a motion to suspend the arrears concurrent with this response.

WHEREFORE, Debtor respectfully requests that the Court deny the Motion to Dismiss.

Date: May 3, 2023

Respectfully submitted,
WATTON LAW GROUP

/s/ Robert K.S. Abernathy
Michael J. Watton; #64316
Robert K.S. Abernathy; #69931
Watton Law Group
1201 Walnut Street, Suite 435
Kansas City, MO 64106
Tel: (816) 702-6800
Fax: (816) 702-6787
Email: wlgkc@wattongroup.com
Attorney for the Debtor

Certificate of Service

The undersigned hereby certifies that a true and correct copy of the foregoing Objection to Trustee Motion to Dismiss was served upon the parties notified by the US Bankruptcy Court's electronic notification on this 3 May 2023.

/s/ Sarita Jackson

Sarita Jackson, Paralegal